

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ESTER LELCHOOK, et al.,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	Civ. Action No. 18-cv-12401 (GBD)
LEBANESE CANADIAN BANK SAL, et al.,	:	
	:	Hon. George B. Daniels
Defendants.	:	
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**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, dated February 14, 2022; the Declaration of Ahmad Safa, dated February 11, 2022; and all prior pleadings and proceedings herein, and in accordance with the so-ordered Stipulation and Order dated January 3, 2022 (ECF No. 50), Defendant Ahmad Safa, by and through his undersigned attorneys, Nixon Peabody LLP, hereby moves this Court before the Honorable George B. Daniels at the United States District Court for the Southern District of New York located at 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an order dismissing the Complaint against Defendant Safa in its entirety and with prejudice pursuant to Fed. R. Civ. P. 12(b)(2) and Fed. R. Civ. P. 12(b)(6), and for such other relief as the Court deems just.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Paragraph 3 of the Stipulation and Order, Plaintiffs have until April 15, 2022 to file an opposition to Defendant Safa's motion to dismiss, and Defendant Safa shall have until May 16, 2022 to reply.

**PLEASE TAKE FURTHER NOTICE** that Defendant Safa respectfully requests oral argument of this motion.

Dated: February 14, 2022  
New York, New York

**NIXON PEABODY LLP**

By: /s/ Daniel A. Schnapp  
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